

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

PARKS, MILLICAN & MANN, LLC

Plaintiff

V.

CASE NO. 2:17-cv-00092

FIGURES TOY COMPANY

and

**RING OF HONOR WRESTLING
ENTERTAINMENT LLC,**

Defendants

**DEFENDANT RING OF HONOR'S
RULE 12(b)(6) PARTIAL MOTION TO DISMISS**

Defendant, Ring of Honor Wrestling Entertainment, LLC (“ROH”), by counsel, files this Rule 12(b)(6) Partial Motion to Dismiss and relies upon the arguments and authorities set forth in the accompanying Memorandum in Support.

WHEREFORE, ROH respectfully requests that this Court grant its Rule 12(b)(6) Partial Motion to Dismiss and dismiss parts of Counts I and VII of the Third Amended Complaint along with all of Count V of the Third Amended Complaint, award costs incurred, and award attorney's fees under 17 U.S.C. § 505 and 17 U.S.C. § 1203.

Dated: December 23, 2017

Respectfully submitted,

RING OF HONOR WRESTLING
ENTERTAINMENT, LLC

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system on this 23rd day of December, 2017, which will then send a notification of such filing to the following:

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